

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 11, 2003

John O. Postl, Esq.
Assistant General Counsel
Global NAPs, Inc.
89 Access Road, Suite B
Norwood, MA 02062

Re: D.T.E. 03-29
D.T.E.'s Second Set of Information Requests to Global NAPs, Inc.

Dear Mr. Postl:

Enclosed please find the second set of questions to Global NAPs, Inc. issued by the Department in the above-captioned matter. Please submit Global NAPs' responses to the Department and the parties in hard copy and by email on or before 5:00 p.m., Tuesday, April 22, 2003. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

/s/
Paula Foley,
Hearing Officer

Encs.
cc: DTE 03-29 service list (w/encs.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Global NAPs, Inc. the following Information Requests.

Instructions

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the response on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the response to Paula Foley, Hearing Officer.

QUESTIONS TO GLOBAL NAPS, INC.

D.T.E. 03-29

April 11, 2003

1. Prior to August 2002 (when Verizon's new application requirements went into effect), had Global NAPS renewed or replaced any collocation identification badges or access cards with Verizon? If so, did Global NAPS provide its employees' social security numbers, and dates and places of birth on those renewal or replacement applications? Did Global NAPS renew those identification badges or access cards prior to or after their expiration date?
2. For each post-August 2002 renewal or replacement application returned to Global NAPS by Verizon as incomplete, please identify the following:
 - a. the expiration date of the collocation identification badge or access card;
 - b. the date the renewal application was submitted by Global NAPS to Verizon; and
 - c. the date that Verizon provided notification to Global NAPS of the incomplete application.
3. For each post-August 2002 renewal or replacement application returned to Global NAPS by Verizon as incomplete, please provide the following documentation:
 - a. a copy of the renewal or replacement application submitted to Verizon; and
 - b. a copy of Verizon's notification to Global NAPS of the incomplete application.
4. Please refer to Global NAPS' response to DTE-GN 1-4: Global NAPS states that "[m]any of Global's employees have experience in our armed forces and have already undergone rigorous background checks."
 - a. Does Global NAPS receive copies of the background evaluations referenced in Global NAPS' statement?
 - b. Does Global NAPS know in what year the background evaluations referenced in Global's statement were conducted?
 - c. If the answer to either "a" or "b" or both is no, please explain Global NAPS' position that conducting its own background evaluations is "unnecessary, duplicative and inefficient" as stated in Global NAPS' response to DTE-GN 1-4.
5. Does Global NAPS agree that a background investigation conducted more than five years ago is no longer a relevant indicator of an individual's security risk? At what point, if any, does a background investigation become "out-dated" to the extent that it is of insufficient use to evaluate an individual's security risk?
6. How many of Global NAPS' employees require collocation identification badges and access cards from Verizon in order to perform their assigned duties in Verizon facilities?